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March 23, 2018

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Re: DOJ No. 90-5-2-1-09611 –Disclosure of Potential Consent Decree Violation

To Whom It May Concern:

AdvanSix Resins & Chemicals LLC (“AdvanSix”, formerly Honeywell Resins & Chemicals LLC) is making this submittal pursuant to the Consent Decree in United States of America and Commonwealth of Virginia v. Honeywell Resins & Chemicals LLC (“consent decree”), the reference for which is Civil Action Number: 3:13-cv-00193-REP, and DOJ Case Number: 90-5-2-1-09611.

Paragraph 49b of the consent decree directs AdvanSix to notify the United States and VADEQ if AdvanSix violates, or has reason to believe that it may violate, any requirement of this consent decree. AdvanSix is submitting notification of potential violations of Appendix A of the consent decree with this letter. Notification is being made within ten days of the date AdvanSix first became aware of this item.

The following Consent Decree issue was identified during LDAR leak checks on March 15, 2018:

Installation of a new valve in the Equipment Replacement/Improvement Program (Appendix A, Paragraph 19) and Management of Change (Appendix A, Paragraph 24) – On March 15th, AdvanSix employees discovered a leaking valve that was not an approved certified low leak technology (CLLT) valve. The valve was on equipment APT-82 in operating Area 6. Based on the current information available, we think it likely that the valve was installed during an APT-82 maintenance outage (11/17/17 to 11/21/17). The valve appears to have been installed along with a pressure gauge to be used as part of the pressure testing of the equipment prior to returning the equipment to service, with the intention of removal upon completion of the test. The valve and pressure gauge

then may have inadvertently remained in service after the pressure test was completed.

The valve was replaced with a CLLT valve on March 15th. The likely cause of this incident was a management of change (MOC) issue. An investigation is being conducted into this incident and additional corrective actions will be implemented as part of the investigation to address the identified causes. As required by the Consent Decree, AdvanSix will amend this report within 30 days of becoming aware of the cause of the violation and provide a full explanation of the cause of the violation.

If further information is required, please contact me at (804) 541-5119 or by email at Phillip.Sparks@AdvanSix.com.

Regards,

A handwritten signature in black ink, appearing to read 'P. Sparks', with a stylized, flowing script.

Phillip Sparks
Sr. Environmental Engineer

DISTRIBUTION

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K. Nicholas (VADEQ -- Central Office)

DOCUMENT CERTIFICATION

Facility Name: AdvanSix Resins & Chemicals LLC

Facility Location: 905 East Randolph Road, Hopewell, VA 23860

Type of Submittal Attached: Disclosure of Potential Consent Decree Violation

Consent Decree Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name of Authorized Official: Frederick P. Harry

Title: Site Manager

Signature:  **Date:** March 23, 2018